UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

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UNITED STATES OF AMERICA,)	Ft.B 2 1 20ga
Plaintiff,)	Solven and Child Solven and Albanda
v.))	NO. S1-4:07CR00231 JCH (DDN)
ERIK G. GARCIA and)	
MARCO A. GARCIA,)	
)	
Defendants.)	

SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but including August 2004, and continuing thereafter to the date of this indictment, with the exact dates unknown to this Grand Jury, in the Eastern District of Missouri and elsewhere,

ERIK G. GARCIA and MARCO A. GARCIA.

the defendants herein, did knowingly and intentionally conspire, combine, confederate and agree with each other, Zelman Sanders, III, Michael Mabry, Perry L. Sheard and other persons known and unknown to this Grand Jury, to commit an offense against the United States, to wit: to knowingly and intentionally possess with the intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

B. Manner And Means Of The Conspiracy

1. It was part of the drug-trafficking conspiracy that defendants Erik G. Garcia and Marco A. Garcia and co-conspirators located in Arizona were the source of supply for significant quantities of marijuana.

- 2. It was further part of the drug-trafficking conspiracy that defendants Erik G. Garcia and Marco A. Garcia utilizing various addresses, either directly or utilizing coconspirators and other individuals shipped significant quantities of marijuana from Arizona to locations within the Eastern District of Missouri and elsewhere.
- It was further part of the drug-trafficking conspiracy that the marijuana
 would be shipped to Zelman Sanders, III, Michael Mabry and Perry L. Sheard utilizing various delivery sites.
- 4. It was further part of the drug-trafficking conspiracy that Zelman Sanders, III,
 Michael Mabry and Perry L. Sheard redistributed the marijuana to individuals within the Eastern
 District of Missouri.
- 5. It was further part of the drug-trafficking conspiracy that money, in the form of United States Postal money orders and other types of money orders, were mailed back to defendants Erik G. Garcia and Marco A. Garcia and co-conspirators in Arizona for the purchase/payment of marijuana.
- 6. It was further part of the drug-trafficking conspiracy that money, in the form of cash deposits into various Arizona bank accounts, were made in the Eastern District of Missouri by Zelman Sanders, III, and co-conspirators either directly or by utilizing other individuals for the purchase/payment of marijuana.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1); and

The quantity of the controlled substance involved in the offense was in excess of 100 kilograms of marijuana, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B)(vii).

COUNT TWO

The Grand Jury further charges that:

A. In or about August 2004, and continuing thereafter to the date of the indictment, with the exact dates unknown to this Grand Jury, in the Eastern District of Missouri and elsewhere,

ERIK G. GARCIA and MARCO A. GARCIA.

the defendants herein, did knowingly and willfully conspire, combine, confederate and agree with Zelman Sanders, III and other persons known and unknown to this Grand Jury, to commit an offense against the United States, to wit: (a) to knowingly and willfully conduct financial transactions affecting interstate commerce, to wit: transactions in the Eastern District of Missouri involving the purchase of United States Postal Money Orders and other money orders and their subsequent negotiation in Arizona; and that these transactions involved the proceeds of some form of an unlawful activity, to wit: conspiracy to distribute and possess with intent to distribute marijuana; (b) with the intent to promote the carrying on of the above referenced specified unlawful activity; and (c) that while conducting and attempting to conduct such financial transactions the defendants knew that the money involved in the financial transactions represented the proceeds of some unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

B. MANNER AND MEANS OF THE CONSPIRACY

The defendants Erik G. Garcia and Marco A. Garcia and co-conspirators including Zelman Sanders, III, accomplished and attempted to accomplish the object of this money laundering conspiracy in the following manner and through the following means:

- 1. It was part of said money laundering conspiracy that Zelman Sanders, III, conspiring with defendants Erik G. Garcia and Marco A. Garcia utilized money derived from drug trafficking activity and purchased United States Postal Money Orders and other money orders in the St. Louis, Missouri, metropolitan area and elsewhere.
- 2. It was part of said money laundering conspiracy that the postal money orders and other types of money orders would be mailed and/or shipped to defendant Erik G. Garcia and others in Arizona for the purchase/payment of marijuana.
- 3. It was part of said money laundering conspiracy that defendants Erik G. Garcia, Marco A. Garcia, co-conspirators and others would submit the money orders directly to merchants in exchange for other assets, deposit the money orders into bank accounts or cash or direct others to cash the United States Postal Money Orders in Arizona.
- 4. It was part of said money laundering conspiracy that defendant Zelman Sanders,
 III, would make cash deposits and/or direct others to make cash deposits from the Eastern
 District of Missouri into various Arizona bank accounts belonging to co-conspirators and others.
- 5. The United States Postal Money Orders purchased and/or negotiated by the defendants include but are not limited to the following:

Date	ate Event Item No.		Issue Zip	Addressee / Payee:	Sender / Payor:	Amount	
	MO						
01/10/05	Purchase	0670550800	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00	
	MO						
01/10/05	Purchase	0670550801	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00	
	MO						
01/10/05	Purchase	0670550802	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00	
	MO						
01/10/05	Purchase	0707504104	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00	
	MO						
01/10/05	Purchase	0707504105	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00	
	MO			,			
01/10/05	Purchase	0707504106	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00	
	MO						
01/10/05	Purchase	0707504107	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00	

<u>Date</u>	<u>Event</u>	Item No.	Issue Zip	Addressee / Payee:	Sender / Payor:	Amount
01/10/05	MO	0707504100	62201	(C_:1 D., LICDIC)	(Coined Dec LICDIC)	g1 000 00
01/10/05	Purchase MO	0707504108	62201	Seized By USPIS) (Seized By USPIS)		\$1,000.00
01/10/05		0707504109	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/03	MO	0707504107	02201	(Scized by CSI IS)	(Seized by CSI IS)	\$1,000.00
01/10/05		0708339719	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
0 17 107 00	MŌ					
01/10/05		0708339720	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
	MO					
01/10/05		0708339721	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
	MO					
01/10/05		0708339722	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
	МО				la	
01/10/05		0708339723	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	МО	0700220724	(2017	(C-: 1 D LICDIC)	(G-i 4 D LICDIC)	£1,000,00
01/10/05	Purchase	0708339724	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05						\$15,000.00
Total	MO				Antonio Ceja, 1305 N	\$13,000.00
01/20/05	1	0707572089	62203	Sam Levitz Furniture Co.	Grand, Nogales, AZ 85621	\$1,000.00
01/20/03	Turchase	0707372009	02203	Sum Ecvitz i armare co.	Monica Chavez	Ψ1,000.00
	МО			,	5077 E. Butterwood	1 1
01/20/05		0707572090	62203	Imagine Realty	Tucson, AZ 85706	\$1,000.00
				,	Ken or Barb Dean	
	MO				301 W. Black Rd.	
01/20/05	Purchase	0707572091	62203	Sears (036360617299-9)	Huachuca City, AZ 85616	\$800.00
01/20/05						
Total			<u> </u>			\$2,800.00
				· ·	Antonio Ceja	
01/21/05	MO	0660636653	62204	Same I assista Essentiana Ca	1305 N Grand	£1,000,00
01/21/05	Purchase	0669626652	62204	Sam Levitz Furniture Co. Kondwani Johnson	Nogales, AZ 85621 Charmella Floy	\$1,000.00
	МО			7360 E Fayette	4504 W 27th, Apt 10	
01/21/05		0669626653	62204	Tucson, AZ 85730	Pine Bluff, AR 71603	\$750.00
01/21/03	MO	0003020033	02201	1 405011, 712 05 750	The Blan, Aix 71005	\$750.00
01/21/05		0707505962	62201	Jesses Pro Tire & Wheel	Felix I	\$1,000.00
	MO					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
01/21/05	Purchase	0707505963	62201	Jesses Pro Tire & Wheel	Felix I	\$1,000.00
	MO					
01/21/05	Purchase	0707505964	62201	Clementina Rivera	Clementina Rivera	\$800.00
				Ship-n-Mail Express		
	МО			2114 W. Grant Road		
01/21/05	Purchase	0707572174	62203	Tucson, AZ 85745		\$1,000.00
1	1,40				Antonio Ceja	
01/21/05	MO	0707572175	62202	Same I assista Essential C	1305 N Grand	#1 000 O
01/21/05	MO	0707572175	62203	Sam Levitz Furniture Co.	Nogales, AZ 85621	\$1,000.00
01/21/05		0707572176	62203	Clementina Rivera	Clementina Rivera	\$000 O
01/21/03	ruichase	0/0/3/21/0	02203	Monica Chavez	Ernesto Chavez	\$800.00
	МО			1111 E. Limberlost #33	331 W. Grant #1	
1	1	0708339550	63017	Tucson, AZ 85719	Phoenix, AZ 85003	

Date			Sender / Payor: Amou			
				A-L Financial	Arnulfo Garcia	
	MO			β151 E. Broadway	1111 E. Limberlost #33	,
01/21/05	Purchase	0708339551	63017	Tucson, AZ 85711	Tucson, AZ 85719	\$1,000.00
				Arnulfo V. Garcia	Rogelio Armento	
	MO			1111 E. Limberlost	6410 N. Galaxy	
01/21/05		0708339552	63017	Tucson, AZ 85719	Tucson, AZ 85749	· \$1,000.0d
01/21/00			_	Lorencia Alvarez		
	MO			123 W Delano		·
01/21/05		0708339553	63017	Fucson, AZ 85705	Erik Garcia	\$1,000.0d
01/21/05	Tarenase	0,0000	0001	Marco Garcia	Arnulfo Garcia	
	МО			1111 E. Limberlost #33	1111 E. Limberlost #33	!
01/21/05		0708339554	63017	Tucson, AZ 85719	Tucson, AZ 85719	\$1,000.0d
01/21/03	Turchase	0700557554	03017	Monica Chavez	Ernesto Chavez	1,000,00
	МО			1111 E. Limberlost #33	331 W. Grant #1	
01/01/05		0708339555	63017	Tucson, AZ 85719	Phoenix, AZ 85003	\$1,000.00
01/21/05	Purchase	0708339333	03017	l ucson, AZ 85719	Flocinx, AZ 83003	\$1,000.00
01/21/05						\$13,350.00
Total				A-1-tt- Caraia		\$13,330.00
	,,,,			Arlette Garcia]	
	MO	0.701.02201	(2200	168 W. Finedale	Tana Garage	61,000,00
01/31/05	Purchase	0670162301	62208	Tucson, AZ 85706	Jose Carrasco	\$1,000.00
			1	Ship-n-Mail Express	1	
	МО			2114 W. Grant Road		
01/31/05	Purchase	0670162302	62208	Tucson, AZ 85745	Natures Gems	\$1,000.00
				Arnulfo V. Garcia		1 1
	MO			1111 E. Limberlost	·	
01/31/05	Purchase	0670162303	62208	Tucson, AZ 85719	Jorge Ramos	\$800.00
				Arlette Garcia		
	MO			168 W. Finedale		
01/31/05	Purchase	0707354659	62223	Tucson, AZ 85706	Jose Carrasco	\$1,000.00
				Arlette Garcia		
	MO			168 W. Finedale	:	
01/31/05	Purchase	0707354660	62223	Γucson, AZ 85706	Jose Carrasco	\$1,000.00
				Support Payment		
		1		Clearing House	Gabriel Garcia	1
	MO			PO Box 52107	1111 E. Limberlost #33	
01/31/05	Purchase	0707354661	62223	Phoenix, AZ 85072	Γucson, AZ 85719	\$800.00
				Arnulfo V. Garcia		
	MO			1111 E. Limberlost		
01/31/05	Purchase	0708339829	63017	Tucson, AZ 85719	Jorge Ramos	\$1,000.00
				Marco Garcia		
	MO		1	1111 E. Limberlost #33	· ·	
01/31/05	Purchase	0708339830	63017	Tucson, AZ 85719	Carlos Soto	\$1,000.00
72.52.55			1	Arnulfo V. Garcia		
	МО			1111 E. Limberlost		
01/31/05		0708339831	63017	Tucson, AZ 85719	Jorge Ramos	\$1,000.00
\$ 2.5 X. VD			1	Arnulfo V. Garcia	1	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	МО			1111 E. Limberlost		
01/31/05		0708339833	63017		Jorge Ramos	\$1,000.00
01/31/03	T di Cimo	3.000000	- 55017			\$ 2,000.00
	MO			· ·		
01/31/05		0708339833	63017	1	Carlos Soto	\$1,000.00
01/31/05	Purchase MO	0708339832		Tucson, AZ 85719 Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Jorge Ramos Carlos Soto	

<u>Date</u>	<u>Event</u>	Item No.	Issue Zip		Sender / Payor:	Amount
				Lorencia Alvarez		
	MO			123 W Delano		
01/31/05	Purchase	0708339834		Tucson, AZ 85705	Erik Garcia	\$1,000.00
				Arnulfo V. Garcia		
	MO			1111 E. Limberlost		
01/31/05	Purchase	0743754726	63011	Tucson, AZ 85719	Jorge Ramos	\$1,000.00
	_			Marco Garcia		
	MO			1111 E. Limberlost #33		
01/31/05	Purchase	0743754727	63011	Tucson, AZ 85719	Carlos Soto	\$1,000.00
				Lorencia Alvarez		
	MO			123 W Delano		
01/31/05	Purchase	0743754728	63011	Tucson, AZ 85705	Erik Garcia	\$1,000.00
				Arlette Garcia		
	MO			168 W. Finedale		
01/31/05	Purchase	0743754729	63011	Tucson, AZ 85706	Jose Carrasco	\$1,000.00
				Arlette Garcia		
	МО			168 W. Finedale		
01/31/05		0743754730	63011	Tucson, AZ 85706	Jose Carrasco	\$1,000.00
01/31/05						
Total						\$16,600.00
10181				Stewart Title		
	МО			5650 S. 12th Ave.		
02/01/05	_	0640710510	62201	Tucson, AZ 85706	Maria G	\$400.00
02/01/03	1 (11.011		-	Marco Garcia		
	МО			1111 E. Limberlost #33		
02/01/05		0640710511	62201	Tucson, AZ 85719	Carlos Rojas	\$400.00
02/01/03	Turennoc	00.0.10011		Monica Chavez	Armando Nunez	
]	МО			1111 E. Limberlost #33 .	6816 W. Sire Libre	
02/01/05		0640710512	62201	Tucson, AZ 85719	Glendale, AZ 85306	\$1,000.00
02/01/05	, unioning		-	Bernadette Contreas	Cipriano	42,0
	МО			2101 S. Cottonwood Lane	5290 S Rock #1105	
02/01/05		0640710513	62201	Tucson, AZ 85713	Tucson, AZ	\$1,000.00
02/01/03	Turemuse	0010710010		Marco Garcia		- 42,000.00
	MO	ŀ		1111 E. Limberlost #33		
02/01/05		0640870024	63011	Tucson, AZ 85719	Carlos Rojas	\$700.00
02/01/03	Turemuse	00.00.002.	00011	Ship-n-Mail Express		47.00.00
	МО			2114 W. Grant Road	1	
02/01/05		0640870025	63011	Tucson, AZ 85745		\$700.00
02/01/03	Turemuse	00.0070020	00011	Marco Garcia	 	
	МО		1	1111 E. Limberlost #33		ı
02/01/05		0669626769	62204	Tucson, AZ 85719	Art Garcia	\$1,000.00
02/01/03	Turchase	0003020703	02201	Bernadette Contreas	Cipriano	Ψ1,000.00
	MO		1	2101 S. Cottonwood Lane	5290 S Rock #1105	
02/01/05		0669626770	62204	Tucson, AZ 85713	Tucson, AZ	\$1,000.00
02/01/03	Turchase	0007020770	02204	Monica Chavez	Ernesto Chavez	\$1,000.00
	MO			1111 E. Limberlost #33	331 W. Grant #1	
02/01/05		0669626771	62204	Tucson, AZ 85719	Phoenix, AZ 85003	\$800.00
02/01/03	1 tilenase	0007020771	02204	Janel Laguna	1.001111, 112 00000	\$600.00
	МО			4120 S. Queen Palm		
02/01/05	1	0669626788	62204	Tucson, AZ 85730	Terry Gomez	\$1,000.00
02/01/03	Turchase	3007020788	02204	Monica Chavez	Armando Nunez	\$1,000.00
	МО	l		1111 E. Limberlost #33	6816 W Sire Libre	
02/01/05		0669626789	62204	Tucson, AZ 85719	Glendale, AZ 85306	\$1,000.0
02/01/03	Fulchase	10003020763	02204	µ исэон, гъд 05/17	Dichaic, AZ 03300	

Date			Sender / Payor:	Amount		
					Zelman Sanders	
	MO				1769 N. 38 th	'
02/01/05	Purchase	0669626795	62204		E. St. Louis, Illinois 62204	\$800.00
					Mary Suttle	
	MO			1704 N. 45 th	1704 N. 45 th	1 1
02/01/05	Purchase	0669626796	62204		E. St. Louis, Illinois	\$1,000.00
					Mary Suttle	
	MO			1704 N. 45 th	1704 N. 45 th	
02/01/05	Purchase	0669626797	62204	E. St. Louis, Illinois	E. St. Louis, Illinois	\$1,000.00
				Arnulfo V. Garcia		
	MO			1111 E. Limberlost		
02/01/05	Purchase	0670161066	62208	Tucson, AZ 85719	Jorge Ramos	\$1,000.00
				Arnulfò V. Garcia		
	MO			1111 E. Limberlost		1 1
02/01/05		0670161067	62208	Tucson, AZ 85719	Jorge Ramos	\$1,000.00
02.01.00				Lorencia Alvarez		
	МО			123 W Delano	1	
02/01/05		0670161068	62208	Tucson, AZ 85705	Erik Garcia	\$800.00
02/01/00				Desert Springs	Marco A. Gargia	
	МО			3727 E 24th Street	5484 N. 43rd, #43	
02/01/05		0670162311	62208	Tucson, AZ 85708	Glendale, AZ 85301	\$850.00
02/01/03	Turemuse	0070102011		Janel Laguna		
	МО			4120 S. Queen Palm		
02/01/05		0670162312	62208	Tucson, AZ 85730	Terry Gomez	\$1,000.00
02/01/03	Turenase	0070102512	02200	Lolamai Mobile Park	Marco A. Garcia	
	МО			5484 N 43rd Ave.	5484 N. 43rd, #43	
02/01/05		0670272510	62201	Glendale, AZ 85301	Glendale, AZ 85301	\$600.00
02/01/03	Turenase			Lorencia Alvarez		
	МО			123 W Delano		
02/01/05		0670272511	62201	Tucson, AZ 85705	Gloria Torres	\$600.00
				Marco Garcia		
	MO			1111 E. Limberlost #33		
02/01/05		0670272512	62201	Tucson, AZ 85719	Carlos Rojas	\$800.00
0 0 2 0 0				Ship-n-Mail Express	1	
	МО		1	2114 W. Grant Road		· .
02/01/05		0670272513	62201	Tucson, AZ 85745	Natures Gems	\$800.00
				Meloza Moreno		
	МО			4444 E. Benson Hwy. #161		
02/01/05		0670272531	62201	Tucson, AZ		\$1,000.00
				Bernadette Contreas	Cipriano	
١.	MO			2101 S. Cottonwood Lane	5290 S Rock #1105	
02/01/05	Purchase	0670272532	62201	Tucson, AZ 85713	Tucson, AZ	\$1,000.00
				Evangelina Meza	David Terrazas	
	MO			3309 S. Napa Vista	2850 E. Kaibab Vista	
02/01/05	1	0670272533	62201	Tucson, AZ 85713	Tucson, AZ 85713	\$1,000.0
				Arnulfo V. Garcia	<u> </u>	
	МО			1111 E. Limberlost	,	
02/01/05		0707354667	62223	Tucson, AZ 85719	Jorge Ramos	\$1,000.0
02,01,00	1 11 011 1150	1	1 2223	Marco Garcia		32,000.0
	МО			1111 E. Limberlost #33		

Date	Event	Item No.	Issue Zip	Addressee / Payee:	Sender / Payor:	Amount
,				Lorencia Alvarez		
	MO			123 W Delano		
02/01/05	Purchase	0707354669	62223	Tucson, AZ 85705	Erik Garcia	\$800.00
				Bernadette Contreas	Cipriano	
	MO			2101 S. Cottonwood Lane	5290 S Rock #1105	
02/01/05		0707354845	62223	Tucson, AZ 85713	Fucson, AZ	\$1,000.00
			_	Meloza Moreno		
	MO			4444 E. Benson Hwy #161		
02/01/05		0707354846	62223	Tucson, AZ		\$1,000.00
02/01/02				Miguel Hong	Amelia Chivas	
	MO			5603 E. 28th Street	4723 S. Camino De La Plaza	
02/01/05		0707354847	62223	Fucson, AZ 85711	Tucson, AZ 85714	\$800.00
02/01/03	Turenase	0,0,00	02220	Meloza Moreno	,	
	МО			4444 E. Benson Hwy #161		1
02/01/05		0707355098	62223	Tucson, AZ		\$1,000.00
02/01/03	Turchase	0707333070	OLLES	Meloza Moreno		\$1,000.00
	МО			4444 E. Benson Hwy #161		1
02/01/05		0707355099	62223	Tucson, AZ		\$1,000.00
02/01/03	Turchase	0101333077	OZZZ3	Ship-n-Mail Express		Ψ1,000.00
	мо			2114 W. Grant Road		
02/01/05		0707355100	62223	Tucson, AZ 85745		\$800.0d
02/01/03	Fulchase	0707333100	02223	Janel Laguna		\$000.00
	MO			4120 S. Queen Palm		
02/01/05		0707355223	62223	Tucson, AZ 85730	Геггу Gomez	\$1,000.00
02/01/03	Purchase	0707333223	02223	Lorencia Alvarez	rerry doniez	\$1,000.00
	MO			123 W Delano		
02/01/05		0707467424	62203	Tucson, AZ 85705	Erik Garcia	\$800.00
02/01/03	Fulchase	0707407424	02203	Arnulfo V. Garcia	Clik Galeia	\$600.00
	MO			1111 E. Limberlost		
02/01/05		0707467425	62203	Tucson, AZ 85719	Jorge Ramos	\$1,000.00
02/01/03	Pulchase	0707407423	02203	Lorencia Alvarez	Jorge Kalilos	\$1,000.00
	MO			123 W Delano		
02/01/05		0707467426	62203	Tucson, AZ 85705	Erik Garcia	\$1,000.00
02/01/03	Fulcilase	0707407420	02203	Janel Laguna	CHK Galcia	\$1,000.00
	MO			4120 S. Queen Palm	1	
02/01/05	1	0707467427	62203	Tucson, AZ 85730	Terry Gomez	\$1,000.00
02/01/05	Purchase	0707407427	02203	Janel Laguna	Terry Goinez	\$1,000.00
	МО			4120 S. Queen Palm		
02/01/05		0707467428	62203	Tucson, AZ 85730	Terry Gomez	\$1,000,00
02/01/03	Purchase	0/0/40/426	02203	Miguel Hong	Amelia Chivas	\$1,000.00
	MO	1		5603 E. 28th Street	4723 S. Camino De La Plaza	
02/01/05	MO	0707467429	62202		Tucson, AZ 85714	1
02/01/05	Purchase	0/0/40/429	62203	Tucson, AZ 85711	1 ucson, AZ 83714	\$800.00
	MO			Marco Garcia 1111 E. Limberlost #33		
02/01/05	1	0707467426	62202	•	Art Garaia	T1.000.00
02/01/05	Purchase	0707467435	62203	Tucson, AZ 85719	Art Garcia	\$1,000.00
	1,40			Marco Garcia		
02/01/05	MO	0707467436	(2200	1111 E. Limberlost #33	h i Garata	
02/01/05	Purchase	0707467436	62203	Tucson, AZ 85719	Art Garcia	\$1,000.00
	1,40			Evangelina Meza	David Terrazas	
02/01/05	MO	0707467435	(2202	B309 S. Napa Vista	2850 E. Kaibab Vista	00000
02/01/05	Purchase	0707467437	62203	Tucson, AZ 85713	Tucson, AZ 85713	\$800.00

Date	<u>Event</u>	Item No.	Issue Zip	Addressee / Payee:	Sender / Payor:	Amount
		-		Meloza Moreno		
	MO			4444 E. Benson Hwy #161		
02/01/05	Purchase	0707467442	62203	Tucson, AZ		\$1,000.00
		-		Monica Chavez	Armando Nunez	
	MO			1111 E. Limberlost #33	6816 W Sire Libre	
02/01/05	Purchase	0707467443	62203	Tucson, AZ 85719	Glendale, AZ 85306	\$1,000.00
				Evangelina Meza	David Terrazas	
	MO			3309 S. Napa Vista	2850 E. Kaibab Vista	
02/01/05	Purchase	0707672540	63117	Tucson, AZ 85713	Γucson, AZ 85713	\$1,000.00
				Evangelina Meza	David Terrazas	
	MO			3309 S. Napa Vista	2850 E. Kaibab Vista	
02/01/05	Purchase	0707672541	63117	Tucson, AZ 85713	Tucson, AZ 85713	\$1,000.00
				Miguel Hong	Amelia Chivas	
	MO			5603 E. 28th Street	4723 S. Camino De La Plaza	
02/01/05	Purchase	0707672542	63117	Tucson, AZ 85711	Tucson, AZ 85714	\$800.00
				A-L Financial	Arnulfo Garcia	
	MO			β151 E. Broadway	1111 E. Limberlost #33	
02/01/05	Purchase	0708339952	63017	Tucson, AZ 85711	Tucson, AZ 85719	\$1,000.00
				A-L Financial	Arnulfo Garcia	
	MO			β151 E. Broadway	1111 E. Limberlost #33	
02/01/05	Purchase	0708339953	63017	Tucson, AZ 85711	Tucson, AZ 85719	\$1,000.00
				Marco Garcia		
	MO			1111 E. Limberlost #33		
02/01/05	Purchase	0708339954	63017	Tucson, AZ 85719	Carlos Soto	\$800.0
				Ship-n-Mail Express		
	MO			2114 W. Grant Road		
02/01/05	Purchase	0743780130	63117	Tucson, AZ 85745	Natures Gems	\$1,000.0
				Evangelina Meza	David Terrazas	
	MO			3309 S. Napa Vista	2850 E. Kaibab Vista	
02/01/05	Purchase	0743780131	63117	Tucson, AZ 85713	Tucson, AZ 85713	\$1,000.0
				Miguel Hong	Amelia Chivas	
	MO			5603 E. 28th Street	4723 S. Camino De La Plaza	1
02/01/05	Purchase	0743780132	63117	Tucson, AZ 85711	Γucson, AZ 85714	\$800.0
02/01/05						
Total			<u></u>			\$50,450.0
Grand					appearance of the second	
Total			<u> </u>			\$98,200.0

6. Zelman Sanders, III, made cash deposits in the Eastern District of

Missouri and elsewhere into various Arizona bank accounts held in the names of co-conspirators and others where the money was utilized. The cash deposits made and utilized by the defendants include but are not limited to the following:

Date of	City, State	Bank of America		• •
Dep	of First Dep	Branch	Account No.	Amount
9/3/04	Little Rock, Arkansas	Little Rock Main	XXXXXXXXX1221	\$4,000.00
9/3/04	Saint Louis, Missouri	East Roosevelt	XXXXXXXXX1221	\$3,000.00
9/18/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$2,500.00
9/20/04	Swansea, Illinois	Swansea	XXXXXXXXX1221	\$4,500.00
11/20/04	Ballwin, Missouri	Ballwin	XXXXXXXXX1221	\$7,830.00
11/30/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$4,000.00
12/16/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$4,150.00
12/21/04	Saint Louis, Missouri	Plaza	XXXXXXXXX1221	\$5,000.00
1/4/05	Saint Louis, Missouri	Lindell	XXXXXXXXX1221	\$5,000.00
1/19/05	Saint Louis, Missouri	Plaza	XXXXXXXXX1221	\$5,000.00
1/26/05	Saint Louis, Missouri	Plaza	XXXXXXXXX1221	\$2,050.00
2/9/05	O'Fallon, Illinois	O'Fallon	XXXXXXXXX1221	\$5,000.00
2/14/05	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$3,000.00
3/10/05	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$1,500.00
			XXXXXXXXX1221	
			Total	\$56,530.00
3/20/06	Saint Louis, Missouri	Manchester	XXXXXXXXX1327	\$7,800.00
3/27/06	Saint Louis, Missouri	Manchester	XXXXXXXXX1327	\$8,000.00
4/3/06	Swansea, Illinois	Swansea	XXXXXXXXX1327	\$7,000.00
4/18/06	O'Fallon, Illinois	O'Fallon	XXXXXXXXX1327	\$8,000.00
4/27/06	Swansea, Illinois	Swansea	XXXXXXXXX1327	\$8,000.00
5/3/06	O'Fallon, Illinois	O'Fallon	XXXXXXXXX1327	\$8,000.00
5/25/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1327	\$7,000.00
7/19/06	Norman, Oklahoma	Norman Sooner	XXXXXXXXX1327	\$1,000.00
9/14/06	O'Fallon, Illinois	O'Fallon	XXXXXXXXX1327	\$6,500.00
9/21/06	Saint Louis, Missouri	Plaza	XXXXXXXX1327	\$5,000.00
			XXXXXXXXX1327	
			Total	\$66,300.00
8/19/04	Swansea, Illinois	Swansea	XXXXXXXXX2354	\$1,000.00
8/23/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX2354	\$5,000.00
9/3/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX2354	\$4,000.00
9/21/04	Ballwin, Missouri	Ballwin	XXXXXXXXX2354	\$7,000.00
9/21/04	Swansea, Illinois	Swansea	XXXXXXXXX354	\$2,500.00
9/29/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX2354	\$7,000.00
			XXXXXXXXX2354	
			Total	\$26,500.00
8/9/04	Little Rock, Arkansas	Downtown North	XXXXXXXXX6566	\$5,000.00
8/13/04	Saint Louis, Missouri	East Roosevelt	XXXXXXXXX6566	\$400.00
8/23/04	Chesterfield, Missouri	Chesterfield	XXXXXXXXX6566	\$5,000.00
9/3/04	Chesterfield, Missouri	Chesterfield	XXXXXXXXX6566	\$3,600.00
9/22/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX6566	\$7,000.00
			XXXXXXXXX6566	
			Total	\$21,000.00

Date of	City, State	Bank of America		
Dep	of First Dep	Branch	Account No.	Amount
9/15/05	Chesterfield, Missouri	Baxter Road	XXXXXXXX7296	\$3,400.00
9/30/05	O'Fallon, Illinois	O'Fallon	XXXXXXXX7296	\$6,000.00
2/9/06	Arizona	Mariposa	XXXXXXXX7296	\$5,000.00
2/14/06	Arizona	Mariposa	XXXXXXXX7296	\$3,000.00
2/22/06	Arizona	Mariposa	XXXXXXXX7296	\$2,000.00
2/27/06	Arizona	Nogales	XXXXXXXXX7296	\$5,000.00
3/17/06	Arizona	Mariposa	XXXXXXXXX7296	\$4,000.00
4/10/06	Arizona	Hewlett	XXXXXXXXX7296	\$2,000.00
4/11/06	Arizona	Mariposa	XXXXXXXXX7296	\$3,000.00
5/1/06	Arizona	Mariposa	XXXXXXXXX7296	\$3,000.00
6/19/06	Arizona	Mariposa	XXXXXXXX7296	\$5,000.00
7/24/06	Arizona	Mariposa	XXXXXXXXX7296	\$1,000.00
			XXXXXXXXX7296	
			Total	\$42,400.00
3/11/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$8,000.00
3/29/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$8,000.00
4/7/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$2,600.00
4/18/06	Saint Louis, Missouri	Plaza	XXXXXXXXX8770	\$7,970.00
5/1/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$8,000.00
5/15/06	Swansea, Illinois	Swansea	XXXXXXXXX8770	\$7,500.00
5/25/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$7,000.00
	,		XXXXXXXXX8770	
			Total	\$49,070.00
			Grand Total	\$261,800.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(h).

COUNT THREE

- 1. The allegations of Count One of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.
- 2. The property, real and personal of defendants Erik G. Garcia, and Marco A. Garcia,

- (a) constituting, or derived from, any proceeds the defendants obtained,
 directly or indirectly, as a result of the violation of law set out in Count One of this Indictment,
 and
- (b) used, or intended to be used, in any manner or part to commit or to facilitate the commission of such violations is subject to forfeiture to the United States.
- 3. Subject to forfeiture is approximately \$445,657 in United States currency in that such sum in the aggregate is property constituting, or derived from any proceeds the defendants obtained directly or indirectly as a result of the offense alleged in Count One.
- 4. Properties specifically subject to forfeiture as set out at paragraph 2 and 3 above, include but are not limited to:
- (a) \$60,000 in United States currency seized from co-conspirator Zelman Sanders, III, on June 6, 2006;
- (b) \$22,657 in United States currency seized from co-conspirator Zelman Sanders, III, on January 19, 2007;
- 5. If any of the property described in paragraphs 2, 3 and 4 above, as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants up to the value of the property described in paragraphs 2, 3 and 4, above, or elsewhere, as being subject to forfeiture.

COUNT FOUR

- 1. The allegations of Count Two of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982.
- 2. The property, real and personal of defendants Erik G. Garcia, and Marco A. Garcia, is property subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 982(a)(1).
- 3. Subject to forfeiture is \$445,657 in United States currency which was property involved in the offense alleged in Count Two or property traceable to such property.
- 4. If any of the property described in paragraphs 2 and 3 above, as being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a), as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction fo the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1)(A) and Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants up to the value of the property described in paragraphs 2 and 3, above, or elsewhere, as being subject to forfeiture.

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FOREPERSON

CATHERINE L. HANAWAY United States Attorney

NOELLE C. COLLINS, #109678 Assistant United States Attorney